## **Table 6: Discovery Requirements**

Discovery Deadlines—What are the discovery deadlines and when are they set?

Limits on Interrogatories—What are the limits on interrogatories?

Limits on Depositions—What are the limits on the number and length of depositions?

Parties Sign Deadline Extension Requests—Are parties (as well as attorneys) required to sign requests to extend discovery deadlines?

Meet and Confer Before Filing Motions—Are counsel required to meet and confer before filing discovery motions? Does a discovery motion have to be accompanied by a certification that counsel met?

Judge's Permission to File Motions—Is the judge's permission required before filing discovery motions?

Staged or Phased Discovery—Is discovery staged? When is it staged and what are the stages or phases?

Other—Are there other relevant provisions?

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
M.D. Ala.	Yes	The court will consider limits on interrogatories in appropriate cases.	The court will consider limits on depositions in appropriate cases.	No	Yes (PD)	IA	The court will consider staged discovery in appropriate cases.	
N.D. Ala.	IA	Unless a different number is fixed by court order or by the parties' stipulation, the maximum number of	The maximum number of depositions (whether on oral examination or written questions) that	No	Except as otherwise stipulated in writing by the parties or ordered by the court in a particular case,	No	IA	Formal discovery under Fed. R. Civ. P. 30–36 is permissible in the following types of cases—if initially filed in,

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		interrogatories (including all discrete subparts) that a party may serve on another party is 25. Absent a court order, however, there is no limitation on the number of interrogatories in:  1. cases brought as class actions under Fed. R. Civ. P. 23; 2. cases filed in, removed to, or transferred to this court before 12/1/93; or 3. cases transferred to this court under 28 U.S.C. § 1407, or joined with cases so transferred.	defendant(s), or by the third-party defendant(s), is 10. Absent a court order, however, there is no limitation on the number of depositions in: 1. cases brought as class actions under Fed. R. Civ. P. 23; 2. cases filed in, removed to, or		formal discovery under Fed. R. Civ. P. 30, 31, 33, and 36 may not be commenced before the meeting of the parties under Fed. R. Civ. P. 26(f) except in the following cases: 1. cases exempted under Fed. R. Civ. P. 26(d) from the requirement of a meeting of the parties; 2. cases in which a temporary restraining order or preliminary injunction is sought; and 3. cases transferred to this court under 28 U.S.C. § 1407, or joined with cases so transferred.			removed to, or transferred to this court after 12/1/93—only with prior approval by the court or by written stipulation of the parties:  1. bankruptcy appeals and withdrawals (Nature of suit 422–23);  2. condemnation actions (Nature of suit 210);  3. deportation actions (Nature of suit 460);  4. equal access to justice-fee award appeals (Nature of suit 900);  5. forfeiture and statutory penalty actions (Nature of suit 610–690);  6. freedom of information actions (Nature of suit 895);  7. government collection actions (Nature of suit 151–153);  8. judgments-actions to enforce or register (Nature of suit 150);  9. prisoner actions (Nature of suit 510–40);  10. selective service actions

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								810); 11. proceedings to enforce or contest government summons and private party depositions; and 12. third-party IRS tax actions (Nature of suit 871).
S.D. Ala.	IA	IA	IA	IA	IA	IA	IA	To further reduce time and expense, the court will take reasonable measures to ensure that parties comply with the Fed. R. Civ. P. regarding discovery.
D. Alaska	Discovery should be completed within 12 months of the filing of the complaint.	Loc. R. 26.3(c) (1/3/95)	Loc. R. 30.1(2)(A)	A party's signature should be required for any second or tertiary requests for continuances of a discovery deadline.	When parties have been unable or unknown to work together and/or where delays in discovery threaten to push a case past the goal of disposition within 18 months, the court should consider requiring a discovery conference and a definitive discovery plan.	Loc. R. 7.1(G) (1/3/95) Loc. R. 37.1(a)(1) (1/3/95)	The court will more actively consider the bifurcation of issues and staged discovery. These are included in the procedures for differential case management and complex case management.	The court will make greater use of discovery masters, especially in complex cases. The court will use magistrate judges or a designated attorney employed by the parties.
D. Ariz.	Discovery deadlines are set	Limits on interrogatories	Limits on depositions are	IA	Yes (PD)	IA	IA	Extension requests must

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	according to DCM track assignment.	are set by DCM track assignment. Cases on the expedited track are limited to 15 interrogatories; cases on the standard track are limited to 40 interrogatories.	set by DCM track assignment. Cases on the expedited track are limited to 1 fact witness deposition per party; cases on the standard track are limited to 8 fact witness depositions per party.					include a list of previously requested extensions.
E.D. Ark.	Yes	Loc. R. 2.12 IA	Loc. R. 2.12 IA	IA	IA	IA	IA	The court will encourage parties to minimize discovery abuse. The court will be sensitive to the need to control discovery in certain cases. The court will help litigants determine what discovery should and should not be done.
W.D. Ark.	IA	IA	IA	CR	IA	IA	IA	
C.D. Cal.	IA	IA	IA	IA	IA	IA	IA	The first extension of time in which to make discovery responses or continue depositions will no longer require court approval.
	Loc. R. 6.4	Loc. R. 8.2.1			Loc. R. 7.15			Loc. R. 3.11.2

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E.D. Cal.	IA	IA	IA	IA	IA	IA	The court will explore staging or staying of discovery in appropriate cases.	
	Loc. R. 240 (10/84; Revised 5/91)	Loc. R. 253(d) (12/93)	Loc. R. 253(d) (12/93)		Loc. R. 251(b) (10/84; Revised 5/91, 12/93)		Loc. R. 240(a)(6) (10/84; Revised 5/91)	
N.D. Cal.	All deadlines will be considered at the case management conference.  General Order 34 § X F–G (1/1/92; Revised 1/1/93, 1/18/94)		All limits on discovery tools will be considered at the case management conference.  General Order 34 § X F (1/1/92; Revised 1/1/93, 12/1/93, 1/18/94)	IA	Loc. R. 230-4 A	IA	General Order 34 § VIII F1; General Order 34 § IX F1; General Order 34	The Case Management Pilot Program will include a commitment by counsel and the court to develop and impose in every case, sensible and meaningful limits on formal discovery. The court will ask counsel and their clients to address the suitability of ADR in a meaningful, thoughtful way, discussing explicitly the pros and cons of various options.
S.D. Cal.	The judicial officer will prepare a case management order that will include a discovery schedule.	IA	IA	IA	Counsel must meet and confer before filing discovery motions. If counsel are in the same county, they are to meet in person; otherwise, they	IA	IA	

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					can confer by telephone. The meet and confer obligation cannot be met by written correspondence.			
D. Colo.	IA	The court may limit the number of interrogatories and requests for admissions and production.	The court may limit the number of depositions.	Requests for extensions of discovery will be signed by an attorney and served upon all attorneys of record, moving attorney's client, and all pro se litigants.	Attorneys will confer on disputed matters prior to filing motions. When filing any motions, except to dismiss or for summary judgment, attorneys will certify that they have made efforts to resolve the dispute without court intervention.	IA	IA	Discovery is managed at a level appropriate to the needs of the individual case. Informal discovery is encouraged.
D. Conn.	Loc. R. 29.1(6)  IA  Standing Order on Scheduling in Civil Cases (1986)	The limit is 30 written interrogatories, including all parts and subparts. The limit may be waived by agreement of counsel.	IA	IA	Loc. R. 7.1  No discovery motions pursuant to Fed. R. Civ. P. 26–37 will be filed unless accompanied by a certification that counsel met and made a good faith effort to eliminate or reduce the area of controversy and arrive at a mutually satisfactory resolution.	IA	IA	

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D. Del.	In mandatory discovery cases, parties must submit with the initial complaint the names addresses, and telephone numbers of individuals with knowledge of facts and persons interviewed in connection with the litigation, a general description of documents, expert witnesses, written opinions, and any insurance coverage.	IA	IA	IA	IA	IA	IA	
	Loc. R. 16.2(a) (Revised 1/95)	Loc. R. 26.1(b)	Loc. R. 26.1(b)	Loc. R. 16.5 (Revised 1/95)	Loc. R. 7.1.1 (Revised 1/95)			
D.D.C.	Discovery deadlines are discussed by counsel at the meet and confer conference and included in the scheduling statement submitted to the judge 10 days after the conference.  Loc. R. 206(c) (3/1/94) Loc. R. 206(d) (3/1/94)	The court believes that the number of interrogatories should be limited. The judge will set a limit based on the results of the meet and confer conference.	The court believes that the number of depositions should be limited. The judge will set a limit based on the results of the meet and confer conference.	CR	IA IA	IA	The need for phased discovery will be discussed at the meet and confer conference and included in the scheduling statement submitted to the judge 10 days after the conference. The judge will make the final determination.	
	Loc. R. 207(a) (Revised 3/1/94)	Loc. R. 207(b) (Revised 3/1/94)	Loc. R. 207(b) (Revised 3/1/94)				Loc. R. 206.1(b) (3/1/94)	

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M.D. Fla.	The revised Loc. R. 3.05 requires establishment of a discovery plan in the case management and scheduling order in track 2 and 3 cases.	Loc. R. 3.03 (7/1/84; Revised 2/1/94)	Loc. R. 3.02 (7/1/84; Revised 2/1/94)	No	Yes (PD)  Loc. R. 3.01 (7/1/84; Revised 12/1/92, 2/1/94)	No	IA	
N.D. Fla.	Discovery deadlines are established in the scheduling order. (PD)  Loc. R. 16.1 (Proposed)	Interrogatories and requests for admissions are limited to 50. (PD)  Loc. R. 7 (Revised 84) Loc. R. 26.2(C) (Proposed)	The court rejected the Advisory Group's recommendation that the court not implement the deposition limit of proposed Fed. R. Civ. P. 30(a)(2)(4). The court will reconsider this recommendation after it has had some experience with the change.  Loc. R. 26.2(E)(2) (Proposed)	Loc. R. 7 (Revised 84)	Loc. R. 6(B) (Revised 84) Loc. R. 26.1 (Proposed)	Loc. R. 7(D) (Revised 84) Loc. R. 6.1 (Proposed) Standing Order (7/94)	IA	The losing party in a discovery dispute must pay the prevailing party's fees and attorney costs. (PD)  Loc. R. 26.2(A) (Proposed) Loc. R. 26.2(B) (Proposed) Loc. R. 26.2(E) (Proposed)
S.D. Fla.	Each civil case is assigned a discovery deadline based on the complexity of the case and other factors, using a modified form of differentiated case management.  The categories of cases and related uniform discovery	IA	IA	IA	A local rule will be enacted requiring each discovery motion to include:  1. a statement from movant's counsel that a good faith effort was made to resolve by agreement with opposing counsel the issues raised and  2. a statement of	IA	IA	

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	schedules are: 1. expedited cases (90–179 days); 2. standard cases (180–269 days); and 3. complex cases (270–365 days). The plan provides general guidelines for determining the most appropriate and fair discovery period for a case.  Loc. R. 16.1(A)2 (2/15/93)	Loc. R. 26.1(G) (12/1/94)	Loc. R. 26.1(F) (12/1/94) Loc. R. 26.1(J) (12/1/94)		whether there was any objection to the motion. This would go further than the current local rule, which applies only to motions to compel and motions for protective order.  Loc. R. 26.1(I) (12/1/94)			
M.D. Ga.	IA	IA Loc. R. 4.3	IA	Neither the Advisory Group nor the court favor a requirement that parties sign extension requests; extension practice has been recently addressed and limited by local rule changes.  Loc. R. 6	Local rule already requires precertification that discovery disputants have consulted before any motions to compel discovery.  Loc. R. 3.6	IA	IA	
N.D. Ga.	Loc. R. 4.1  Discovery deadlines are set by track in the courts discovery tracking system:  1. 0 months for student loan, overpayment of veterans benefits, enforcement and	(6/2/93) IA	IA	(6/2/93) The court agrees with the Advisory Group that a requirement that extension requests be signed is not the best procedure for curbing	(6/2/93) PD	IA	IA	Parties will be required to give reasons in their preliminary statement for extensions of the discovery deadline. Motions to extend discovery

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	overpayment of judgments, prisoner petitions other than death penalty and civil rights, bankruptcy, and Social Security cases; 2. 8 months for antitrust, securities/commo dities, and patent cases; and 3. 4 months for all other cases.	Loc. R. 225-2(a) (1/1/85)	Loc. R. 225-2(b) (1/1/85)	delays in civil litigation.	Loc. R. 225-4(a) (1/1/85)		Loc. R. 201-2 Loc. R. 225-1(a) (Revised 7/1/92)	must be made prior to the expiration of the discovery period and must be based on circumstances that could not have been anticipated at the time the preliminary statement was filed.
S.D. Ga.	Loc. R. 7.1 (1/82; Revised 6/94); Renumbered Loc. R. 26	Each party is limited to 25 interrogatories, including subparts. (PD)  Loc. R. 7.4 (Eliminated 6/94; Fed. R. Civ. P. 33 now controls interrogatories)	IA	Loc. R. 8 (added 6/94); Renumbered Loc. R. 3.3	Yes (PD)  Loc. R. 6.5 (1/82); Renumbered Loc. R. 26.7	IA	Loc. R. 8.5 (6/94); Renumbered Loc. R. 16.1	
D. Guam	Discovery deadlines are set by the parties in the scheduling order.	IA	Loc. R. 230-2 (1983; Revised	IA	Prior to the filing of any discovery motion relating to a discovery dispute, the parties will meet in person in a good faith effort to eliminate the need for hearing the motion or to eliminate as many disputes as possible.	A discovery motion may be filed without the leave of the court.	The scheduling order will consider the possibility of phased discovery, with the first phase limited to developing information needed for a realistic assessment of the case. If the case does not terminate, the second phase would be directed at	In the absence of good cause shown or disabling circumstances, the deadlines set forth in the scheduling order will not be extended for any reason. If the discovery deadline is extended, the remaining discovery must be specifically described and scheduled.

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		Loc. R. 230-3 (1983; Revised 9/12/94)	9/12/94) Loc. R. 230-4 (1983; Revised 9/12/94) Loc. R. 230-5 (1983; Revised 9/12/94)	Loc. R. 235-9	Loc. R. 230-8 (9/12/94)	Loc. R. 230-8 (1983; Revised 5/31/94; Revised 9/12/94)	information needed to prepare the case for trial. Loc. R. 235-3(e) (5/31/94; Revised 9/12/94)	Loc. R. 235-9 (5/12/94; Revised 9/12/94)
D. Haw.	Discovery deadlines are set at the scheduling conference when the trial date is set. All discovery must be completed 30 days prior to the scheduled trial date. (PD)	IA	The court will exercise greater control to avoid abuse by counsel.	The court has the rules committee designation of a rule requiring certification of client concurrence, but there is no requirement of the client's signature.	Discovery motions must be accompanied by certification that counsel met in a good faith effort to resolve the discovery dispute. (PD)	IA	IA	The court will encourage greater civility.
	Loc. R. 235-4 (11/91)	Loc. R. 230-16 (11/91)			Loc. R. 230-4 (11/91)	Loc. R. 230-4 (11/91)	Loc. R. 235-4 (11/91)	
D. Idaho	The discovery deadline is set in the scheduling order.	No party will serve upon any other single party to an action more then 40 interrogatories, including subparts, without first obtaining a stipulation of such party to additional interrogatories and an order of the court granting leave to serve a specific number of additional interrogatories.	In conformance with Fed. R. Civ. P. 30, there is a presumption that no more than 10 depositions per party will be taken. The parties should, however, be prepared at the scheduling conference to discuss whether the presumption should be decreased or increased due to the nature of the litigation. (This is a revision of the CJRA Plan.)	IA	PD	IA	IA	
		Loc. R. 33.1 (Revised 7/94)	Loc. R. 30.1 (Revised 7/94)		Loc. R. 37.1			

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C.D. III.	Loc. R. 2.10 (1/92)	The local rules already set limits on the number of interrogatories.  Loc. R. 2.7 (1/92)	Loc. R. 2.11 (1/92; Revised 1/94)	IA	Loc. R. 2.8 (1/92) Loc. R. 2.11 (1/92; Revised 1/94)	IA	IA	The Advisory Group found, and the court agrees, that there is no need for revision of current practices in this district to control discovery.
N.D. III.	IA	IA	IA	The Advisory Group and the court rejected this requirement.	PD	IA	The court proposes to amend the standing order to allow phased discovery in complex cases. The choice will be made at the discretion of the judge.	The courts standing order provides a framework through which the court may closely monitor the discovery process. In complex cases, the court may require a joint, written discovery plan. The court will amend the standing order to allow multiple submissions of discovery plans if opposing counsel cannot arrive at an agreement, or to allow the court to resolve any impasse in the preparation of a joint plan. The court endorses the Advisory Group recommendation that costs be taken into account during the discovery process. The

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		Loc. Gen. R. 9G (6/26/85)			Loc. Gen. R. 12K			court will continue to require the filing of a written discovery plan only where directed by the court.
S.D. III.	The discovery cut-off date is set at the initial pretrial and scheduling conference.  Loc. R. 11(b)	IA  Loc. R. 13(a)	IA	IA	The court will refuse to rule on any and all motions unless the moving counsel advises the court that a good faith effort has been made to resolve their differences and reach an agreement.  Loc. R. 12(c)	IA	IA	
	(5/92; Revised 3/94)	(5/92; Revised 3/94)			(5/92; Revised 3/94)			
N.D. Ind.	On a case-by-case basis, the judicial officer will set deadlines for the completion of discovery at the first pretrial conference. These deadlines can only be changed for good cause shown.	Attorneys should comply with local rule limits on interrogatories and requests for admissions.	Counsel should endeavor to keep depositions at a minimum.	The court declined to adopt such a requirement, but signed requests may be required in some cases.	Local rule requires that parties meet and confer before filing discovery motions.	IA	If the initial pretrial conference discloses potentially dispositive issues that can be addressed early, the judicial officer should consider an early deadline for their resolution. Counsel and the judicial officer should consider staged discovery for complex or other appropriate cases.	Litigants should inquire of their counsel regarding the need for contemplated discovery. The court requires stipulated extensions of time to respond to a complaint or discovery request other than that covered by an order for standardized disclosure.
		Loc. R. 26.1			Loc. R. 37.1		Cubos.	Loc. R. 6.1

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S.D. Ind.	IA	IA	IA	IA	IA	IA	IA	
	Loc. R. 6.1	Loc. R. 26.1			Loc. R. 37.1			Loc. R. 37.3
N.D. Iowa	IA	IA	IA	IA	IA	IA	IA	25017415715
	Loc. R. 16(b)(1)				Loc. R. 14(e)			
S.D. Iowa	IA	IA	IA	CR	The court rejects the Advisory Groups recommendation because local rule already requires that parties certify a good faith meeting before a discovery motion is made.	IA	IA	The court rejects the Advisory Group recommendation that parties be required to meet and prepare a discovery plan because proposed Fed. R. Civ. P. 26(f) would require the meeting and plan.
D. Kan.	IA Loc. R. 210(a) (Revised 5/92)	IA Loc. R. 210(d) (Revised 5/92)	IA	IA	IA Loc. R. 210(J) (Revised 5/92)	IA	IA	
E.D. Ky.	Discovery deadlines are discussed at the mandatory status conference.	At the mandatory status conference, the court will address the issue of limiting interrogatories to 25.	At the mandatory status conference, the court will address the issue of limiting depositions to 10.	IA	IA	IA	IA	
		Loc. R. 8(c)			Loc. R. 6(a)(2)	Loc. R. 6(a)(2)		
W.D. Ky.	The court currently sets deadlines for the filing of motions. (PD)	IA  Loc. R. 8(c)	IA	The court will refer this issue to the Advisory Group for its consideration.	PD  Loc. R. 6(a)(2) General Order (EOD 2/1/94)	IA	IA	
E.D. La.	Discovery deadlines are set at the preliminary conference and stated in the court's	The number of interrogatories will be limited in accordance with local rule.	Depositions will be conducted and limited as ordered by the court.	IA	IA	IA	IA	

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	scheduling and management order and will be no later than 30 days prior to the final pretrial conference.	Loc. R. 6.01 (5/89)			Loc. R. 2.11E (5/89)			
M.D. La.	Discovery deadlines are set at the preliminary case management conference.	PD	Depositions are conducted and limited as ordered by the court.	Yes (PD)	Loc. R. 2.11E Loc. R. 2.11M	IA	IA	
W.D. La.	Discovery deadlines are set in the scheduling order issued after the scheduling conference. In establishing the deadlines, the court will adhere to these guidelines: 1. 120 days before pretrial conference: joinder of parties and amendment of pleadings. 2. 90 days before pretrial conference: plaintiff's expert information and reports. 3. Immediately upon receipt: furnishing copies of reports of treating physicians or other relevant information. 4. 60 days before pretrial conference:	IA	IA	IA	IA	IA	IA	

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District	Discovery Deadlines  discovery cut- off; defendant's expert information and reports; filing of dispositive motions.  5. 46 days before pretrial conference: expert depositions.  6. 30 days before pretrial conference: plaintiff's counsel to host conference to prepare pretrial stipulations.  7. 15 days before pretrial conference: motions in limine. 8. 7 days before pretrial conference: motions in limine. 8. 7 days before pretrial conference: motions in limine. 8. 7 days before pretrial conference: pretrial conference: pretrial stipulations. 9. 20 days before trial: discovery of requested surveillance evidence/final	Interrogatories		Extension	Before Filing	Permission	Phased	Other
	deposition of party in question; discovery of rule 613 and 801 impeachment evidence. 10. 21 days before trial: trial depositions (expert and lay witnesses). 11. 10 days							

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	before trial: trial brief and proposed findings of fact and conclusions of law (nonjury trials); joint jury instructions and interrogatories (jury trials); editing of trial depositions, filing objections; affidavit of settlement efforts; exchange of exhibits and demonstrative aids and objections to exhibits; filing objections to impeachment/surveillance evidence.  12. 7 days before trial: bench book to court.	Loc. R. 6.01 (5/89; 4/92)						Loc. R. 6.02W (5/89; 4/92) Loc. R. 6.03W (5/89; 4/92) Loc. R. 6.04W (5/89; 11/93) Loc. R. 6.05 (5/89; 11/93) Loc. R. 6.06 (11/93; 7/94) Loc. R. 6.07W (11/93) Loc. R. 6.08M—W (5/89; 4/92) Loc. R. 6.09W
D. Me.	Deadlines are established in scheduling order.	Thirty interrogatories per party are permitted in standard track cases (subparts are not permitted).	Five depositions per party are permitted in standard track cases.	No (PD)	A party with a discovery dispute must first meet with the opposing party in a good faith effort to resolve the issues in dispute. If that effort is unsuccessful, the request for a hearing with a judicial officer carries with it the professional representation by the lawyer that	No written discovery motion may be filed without the prior approval of a judicial officer.	IA	

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			•	•	the good faith effort has been made.		·	
	Loc. R. 16(c)	Loc. R. 15(b)(2)	Loc. R. 15(b)(2)		Loc. R. 18(e)	Loc. R. 18(e)		
D. Md.	In routine cases, discovery must be completed 120 days after the date of the scheduling order.	IA	IA	IA	Yes	Loc. R. 104.5 Loc. R. 104.7 Loc. R. 104.8	IA	Magistrate judges will attend the scheduling conference if discovery disputes will be referred to them. Magistrate judges will be regularly assigned to hear emergency discovery disputes. District judges are encouraged to issue oral opinions in emergency discovery disputes and to issue opinions within 7 days in all other discovery disputes. The written opinion may be a letter with truncated reasoning.
D. Mass.	Discovery deadlines are discussed at the scheduling conference and are incorporated into the scheduling order.	Each side is limited to 25 interrogatories. (This is a revision of the limit in the CJRA Plan.)	Each side is limited to 10 depositions. (This is a revision of the limit in the CJRA Plan.)	IA	The judicial officer will not consider any discovery motion unless it is accompanied by certification that the moving party made a good faith effort to reach agreement	IA	The judicial officer has the discretion, after the initial disclosure phase of discovery, to phase the use of interrogatories and demands for documents.	

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	Loc. R. 16.1(F) (10/92; Revised 12/94)	Loc. R. 26.1(C) (10/92; Revised 12/94)	Loc. R. 26.1(C) (10/92; Revised 12/94)	Loc. R. 26.2(B)(2) (10/92; Revised 12/94)	with the opposing party on matters set forth in the motion.  Loc. R. 26.2(C) (10/92; Revised 12/94)		Loc. R. 26.3 (10/92; Revised 12/94)	
E.D. Mich.	IA	IA	IA	IA	PD Loc. R. 7.1(a) Loc. R. 37.1	IA	IA	The court rejected an Advisory Group recommendation that the local rules be revised to require a conference with a judicial officer before the filing of a discovery motion.
W.D. Mich.	Discovery deadlines are set by track in the DCM system unless ordered otherwise by the court at the case management conference. Discovery must be completed within 90 days after the case management conference for the voluntary expedited track, 120 days for the expedited track, 180 days for the standard track, and 270 days for the complex track. Deadlines in the highly	Limits on interrogatories are set by track in the DCM system unless ordered otherwise by the court at the case management conference: 15 single-part questions per party in the voluntary expedited track; 20 single-part questions in the expedited track, 30 single-part questions in the standard track, 50 single-part questions in the complex track, and 15 single part questions per	Limits on depositions are set by track in the DCM system unless ordered otherwise by the court at the case management conference: 2 fact witness depositions per party in the voluntary expedited track; 4 fact witness depositions in the expedited track, 8 fact witness depositions in the standard track, and 15 fact witness depositions in the complex track. Any limits in the	IA	IA	IA	IA	

Table 6: Discovery Requirements

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
	complex and administrative tracks are to be determined by the judicial officer at the case management conference.	party for civil rights cases in the administrative track. Any limits in the highly complex and non-DCM tracks are determined by the judicial officer.	administrative, highly complex, and non-DCM tracks are determined by the judicial officer.					
D. Minn.	Discovery deadlines are set in the scheduling order issued after the initial scheduling conference.  Loc. R. 26.1	Each side is limited to 25 interrogatories.	Each side is limited to 10 depositions.	Yes	Yes  Loc. R. 37.1	IA	IA	Bifurcation is considered at the final pretrial conference.
N.D. Miss.	Deadlines are set by the judicial officer presiding at the case management conference, according to track assignment.	The court sets limits by track: 1. Expedited track cases are limited to 15 succinct questions for interrogatories. 2. Standard track cases are limited to 30 succinct questions for interrogatories. 3. Discovery in complex track and mass tort track cases will proceed as needed. 4. There is no discovery in administrative track cases.	The court sets limits by track:  1. In expedited track cases, requests for production depositions are limited to the parties and 3 fact witnesses.  2. In standard track cases, requests for production depositions are limited to the parties and 5 fact witnesses.  3. Discovery in complex track and mass tort track cases will proceed as needed.  4. There is no	Parties may be required to sign, at the court's discretion.	(2/91) IA	IA	After the initial phase of discovery, no discovery will be permitted until entry of a case management plan.	

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
			discovery in administrative track cases.		Loc. R. 6(c)(1)			
S.D. Miss.	Deadlines are set by the judicial officer presiding at the case management conference, according to track assignment.	The court sets limits by track: 1. Expedited track cases are limited to 15 succinct questions for interrogatories. 2. Standard track cases are limited to 30 succinct questions for interrogatories. 3. Discovery in complex track and mass tort track cases will proceed as needed. 4. There is no discovery in administrative track cases.	The court sets limits by track:  1. In expedited track cases, requests for production depositions are limited to the parties and 3 fact witnesses.  2. In standard track cases, requests for production depositions are limited to the parties and 5 fact witnesses.  3. Discovery in complex track and mass tort track cases will proceed as needed.  4. There is no discovery in administrative track cases.	Parties may be required to sign, at the court's discretion.	IA IA	IA	After the initial phase of discovery, no discovery will be permitted until entry of a case management plan.	
E.D. Mo.	IA	IA	IA	IA	IA	IA	IA	
W.D. Mo.	Discovery deadlines are set in the scheduling order.	IA	IA	IA	The local rule requiring parties to confer in person before filing discovery motions is revised to require counsel to confer in person or by telephone. If the dispute is not settled at this	Unless authorized by court order, discovery motions may not be filed until a conference between counsel and the judge has been held.	IA	

Table 6: Discovery Requirements

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
			·	•	conference, counsel must schedule a telephone conference with the court before filing a motion.		·	
	Loc. R. 15F, 15I (1/83; Revised 1/84, 9/92, 7/94)	Loc. R. 15L (1/83; Revised 1/84, 9/92, 7/94)	Loc. R. 15L (1/83; Revised 1/84, 9/92, 7/94)		Loc. R. 15N (1/83; Revised 1/84, 9/92, 7/94)	Loc. R. 15N (1/83; Revised 1/84, 9/92, 7/94)		
D. Mont.	Discovery deadlines are set in the discovery management plan implemented at the preliminary conference.	Limits on interrogatories are set in the discovery management plan implemented at the preliminary conference. Parties may seek relief from excessive interrogatories (usually more than 50).	Limits on depositions are set in the discovery management plan implemented at the preliminary conference.	IA	IA	IA	IA  Loc. R. 235-1	
	Loc. R. 235-1(a)	Loc. R. 200-5(c)			Loc. R. 200-5(c)		Loc. R. 233-1 Loc. R. 225-2	
D. Neb.	IA	IA	IA	IA	IA	IA	IA	The court will consider modifying local rules to provide for automatic discovery that would include:  1. identification of issues of fact and issues of law that the party contends are raised by their claim;  2. the name and address of each witness known to the party; and  3. identification, location, and

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
		Loc. R. 33.1 (Revised 1/93)		Loc. R. 29.1 (Revised 1/93)				name of documents or records that are relevant to their claims. The proposed pretrial order submitted to the parties will identify any videotape deposition intended to be offered. If there is any objection to any portion of the videotape deposition, a transcript of the deposition will be included with the list of objections.
D. Nev.	Discovery deadlines are set in the scheduling order. (PD)	CR	CR	Yes (PD)	Yes (PD)	IA Loc. R. 190-1(g)	IA Loc. R. 190-1(a)	
D.N.H.	IA	Discovery limitations under Fed. R. Civ. P. 26 will be discussed at the preliminary pretrial conference.	Discovery limitations under Fed. R. Civ. P. 26 will be discussed at the preliminary pretrial conference.	Parties are not required to sign requests, but counsel will certify that their clients have been notified of the requests.	The court rejects the Advisory Group's recommendation that the court retain the current local rule that requires the moving party to certify that a good faith effort has been made to resolve the dispute. Instead, the court will amend that rule to require the moving party to	IA	Phased discovery is considered at the preliminary pretrial conference.	

Table 6: Discovery Requirements

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
					serve a copy of its motion on the opposing party. The opposing party will be required to serve an original and a copy of a response on the moving party within the time period to be provided by the local rules and the Fed. R. Civ. P. The moving party will then be responsible for filing both the original motion and response with the court.  Loc. R. 11(b) (5/69; Revised 1/85)			
D.N.J.	The deadline for completion of discovery is set in the scheduling order.	IA	IA	IA	Counsel will confer to attempt to resolve any discovery or case management dispute. If the dispute is not resolved, it will be presented by conference call or letter to the magistrate judge prior to any formal motion. Pro se cases are exempt from this requirement unless the magistrate judge so directs. Discovery or	IA	Counsel for track I and II cases will discuss the possibility of phased discovery prior to the initial scheduling conference. The scheduling order may specify a date for the filing of dispositive motions before the completion of fact discovery or submission of experts' reports.	

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
	Gen. R. 15B.3(c) (12/91)				case management motions must be accompanied by an affidavit certifying a good faith effort to resolve the dispute by agreement. The date and method of communication will also be set forth in the affidavit.  Gen. R. 15E.2 (12/91) Gen. R. 15E.3 (12/91) Gen. R. 15F.1 (10/84 as Gen. R. 15C.1)	Gen. R. 15E.2 (12/91)	Gen. R. 15B.3(d) (12/91)	
D.N.M.	Discovery deadlines are set by DCM track: 1. Expedited: 100 days after filing of the scheduling order; 2. Standard: 200 days after filing of the scheduling order; 3. Complex: deadlines are set on a case-by-case basis.	Limits are set by a local rule that predates the CJRA Plan.	IA	No	Certification that the attorneys met is required by a local rule that predates the CJRA Plan.	No	The need for phased-in discovery is determined by the judicial officer at the pretrial conference.	
E.D.N.Y.	IA	In every civil case filed on or after 2/1/92, there will be a limitation on the number of interrogatories by agreement of the	In every civil case filed on or after 2/1/92, there will be a limitation on the number of depositions by agreement of the	No	IA	IA	In complex cases, the court should consider implementing staged, tiered, or milestone discovery.	

Table 6: Discovery Requirements

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
		parties or court order; in the absence of such, the presumptive limit will be 15 interrogatories (excluding actions brought by the U.S. under 28 U.S.C. § 3101, 18 U.S.C. § 981 and 21 U.S.C. § 881).	parties or court order; in the absence of such, the presumptive limit will be 10 depositions. Requests for nonstenographic recording or depositions will be presumptively granted.		Civ. R. 49.6 (Standing Order 6)	Civ. R. 49.6 (Standing Order 6)		
N.D.N.Y.	Discovery deadlines and the parameters of discovery will be discussed at the pretrial conference. The deadlines will be set in the uniform pretrial scheduling order.	IA	IA	IA	Counsel must make a good faith effort to resolve or reduce all differences relating to discovery. Requests for a discovery conference on disputed matters and formal motions must be accompanied by an affidavit certifying that counsel have conferred in a good faith effort to resolve the discovery differences.	Discovery motions will not be considered unless counsel requests a discovery conference and files a letter brief and counsel submits an affidavit stating that a good faith effort was made between the parties to reduce or resolve the discovery differences.	In complex cases, the judicial officer may provide for the staged resolution or bifurcation of issues for trial consistent with Fed. R. Civ. P. 42(b).	Magistrate judges will conduct all discovery conferences, hear all discovery motions, and have the authority to use discretion in changing discovery deadlines.
S.D.N.Y.	In standard and complex cases, a discovery plan will be developed at the case management conference. Subsequent	General Order 40 The court should adopt rules containing guidelines for deposition practice, interrogatories, requests for	General Order 40 The court should adopt rules containing guidelines for deposition practice, interrogatories, requests for	IA	Loc. R. 7.1(e) In standard and complex cases, discovery issues should be resolved by expedited letter submission (no more than 2	Loc. R. 7.1(e) IA	IA	Discovery will be limited for expedited cases. Sanctions for failure to comply with discovery obligations should be

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
	discovery issues should be resolved by expedited letter submission (no more than 2 double-spaced pages), or by telephone or personal conference after a good faith effort at resolution by all parties.	documents, and discovery of experts.	documents, and discovery of experts.		double-spaced pages), or by telephone or personal conference after a good faith effort at resolution by all parties.			enforced.
W.D.N.Y.	Except for good cause, shown in writing, discovery will be cut-off not more than 6 months from the date of the scheduling order. In pro se prisoner civil rights cases, absent good cause shown in writing, the discovery deadline will be no longer than 8 months from the date of the scheduling order.	IA	IA	Attorney and party may be required to sign requests at the discretion of the court.	IA  Loc. R. 16	IA	IA	
E.D.N.C.	Discovery deadlines are set in the scheduling order.	IA	IA	CR	Counsel will certify that they have conferred and had a full and frank discussion prior to filing a discovery motion.	IA	IA	

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
M.D.N.C.	Discovery deadlines are set according to the DCM track: 4 months for standard cases, 6 months for complex cases, and 9 months for exceptional cases.	Limits on interrogatories are set according to the DCM track: 15 per side in standard cases, 25 per side in complex cases, and 30 per side in exceptional cases.	Limits on depositions are set according to the DCM track: 4 per side in standard cases, 7 per side in complex cases, and 10 per side in exceptional cases.	IA	IA	IA	IA	Parties must communicate throughout discovery to update the discovery schedule. If possible, discovery disputes should be resolved in an expedited manner.
	Loc. R. 204	Loc. R. 204	Loc. R. 204		Loc. R. 204(c)			
W.D.N.C.	Discovery deadlines are set by track in the DCM system:  1. Expedited cases: discovery will be completed within 3 months after the filing of the case management plan;  2. Standard cases: discovery will be completed within 9 months after the filing of the case management plan;  3. Complex cases: discovery will have a cut-off established in the case management plan;  4. Administrative cases: no discovery without prior leave of the	party; 2. Standard cases are limited to 20 single-part questions per party; 3. Complex cases have limits tailored to the case;	Depositions are limited by track in the DCM system:  1. Expedited cases are limited to 1 fact witness deposition per party with prior approval of the court;  2. Standard cases are limited to 6 fact witness deposition per party with prior approval of the court;  3. Complex cases have limits tailored to the case;  4. Administrative cases are not permitted depositions without prior leave of the court; and  5. Mass tort cases have limits tailored to the	Signatures of parties are not required for requests to extend discovery deadlines.	Yes	No	IA	

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
	court; and 5. Mass torts discovery will be treated in accordance with a special case management plan by the court.		case.					
D.N.D.	Loc. R. 10 Discovery deadlines are set in the scheduling/disco very order.	IA	IA	No	Counsel must confer on disputed discovery requests before seeking judicial involvement.	IA	IA	
D. N. Mar. I.	Deadlines are determined by track assignment in the DCM system:  1. Expedited cases will have a discovery cut-off no later than 60 days prior to trial.  2. Standard cases will have discovery cut-off no later then 60 days prior to trial.  3. Complex cases will have a discovery cut-off specified in the case management plan.	Limits are determined by track assignment:  1. Expedited cases: discovery guidelines include interrogatories limited to 15 single-part questions;  2. Standard cases: discovery guidelines include interrogatories limited to 30 single-part questions; and 3. Complex cases: discovery guidelines include interrogatories limited to 50 single-part questions.	Limits are determined by track assignment:  1. Expedited cases: discovery guidelines include depositions limited to 15 depositions of the parties, depositions on written questions of custodians of business records for nonparties, and no more than 1 fact witness deposition per party without prior approval of the court;  2. Standard cases: discovery guidelines include depositions limited to 30 depositions of the	IA	Local rule requires counsel to meet and confer before a discovery motion is filed.	IA	IA	

Table 6: Discovery Requirements

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
			parties, depositions on written questions of custodians of business records for nonparties, no more than 3 fact witness depositions per party without prior approval of the court; and 3. Complex cases: discovery guidelines include depositions limited to 50 depositions of the parties, depositions on written questions of custodians of business records for nonparties.	Loc. R. 230-6				
N.D. Ohio	Discovery deadlines are determined by track assignment:  1. Expedited: cases on this track will have a discovery cut-off no later than 100 days after filing of the case management plan;  2. Standard: cases on this track will have a discovery cut-off no later than 200 days after filing of the case management	Limits on interrogatories are determined by track assignment:  1. Expedited: discovery guidelines include interrogatories limited to 15 single-part questions; and 2. Standard: discovery guidelines include interrogatories limited to 35 single-part questions.	Limits on interrogatories are determined by track assignment:  1. Expedited: discovery guidelines include no more than 1 fact witness deposition per party without prior approval by the court; and  2. Standard: discovery guidelines include no more than 3 fact witness	IA	Discovery disputes may be referred to a judicial officer only after counsel for the party seeking the disputed discovery has certified to the court that sincere, good faith efforts to resolve the dispute have been made.	IA	IA	Parties are encouraged to cooperate with each other in arranging and conducting discovery, including discovery involved in any ADR program. Prior to the case management conference, parties may conduct such discovery as is necessary and appropriate to support or defend against any claim

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
	plan; 3. Complex: cases on this track will have the discovery cut-off specified in the case management plan; 4. Admin- istrative: no discovery is permitted without prior leave of court; and 5. Mass torts: cases on this track will be treated in accordance with the special management plan		depositions per party without prior approval by the court.					for emergency, temporary, or preliminary relief that may be presented.
	by the court.  Loc. R. 8:2.1(b) (1/1/92; Revised 12/15/92)	Loc. R. 8:2.1(b) (1/1/92; Revised 12/15/92)	Loc. R. 8:2.1(b) (1/1/92; Revised 12/15/92)		Loc. R. 8:7.4 (1/1/92; Revised 6/9/92, 12/1/93)			Loc. R. 8:7.2 (1/1/92; Revised 12/15/92, 12/1/93)
S.D. Ohio	IA IA	The court will retain Loc. R. 33.1 and 36.1, limiting the number of interrogatories and requests for admission, absent agreement to a higher number by the parties or leave of court.	IA	CR	The court will retain Loc. R. 37.1 and 37.2, requiring consultation before a discovery motion is filed and certification of extrajudicial efforts to resolve the dispute to accompany the motion.	IA	IA	The court may, in complex cases, consider additional monitoring of discovery, such as requiring an early meeting of counsel, joint preparation of a discovery plan, or other technique likely to contribute to the cost of
		Loc. R. 33.1 (10/91) Loc. R. 36.1 (10/91)			Loc. R. 37.1 (10/91) Loc. R. 37.2 (10/91)	Loc. R. 37.2 (10/91)		effective management of the case.

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District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
E.D. Okla.	IA	IA	IA	IA	IA	IA	IA	
N.D. Okla.	IA	Interrogatories are presumptively limited to 25 for each side.	Local rules set a presumptive time limit of 6 hours per deposition. Depositions are presumptively limited to 10 for each side.  Loc. R. 30.1(G)	Counsel rather than the client may request an extension of time. However, the court should be advised if the client disapproves of the extension request.	IA	IA	IA	The court will consider, in appropriate cases, using adjunct discovery judges to resolve discovery disputes. The court may abate discovery while dispositive motions are pending. The court continues to make itself available for emergency telephone discovery conferences.
	Loc. R. 16.1(H)		Loc. R. 30.1(A)		Loc. R. 37.1			
W.D. Okla.	Discovery deadlines are set at the status/scheduling conference and included in the scheduling order.  Loc. R. 17, Civil Status and Scheduling Conferences; Management (9/1/82; Revised 2/7/83, 5/20/83, 8/11/86, 12/31/91, 6/15/93, 4/20/94)	Loc. R. 10 (9/1/82; Revised 5/20/83, 4/20/94)	Loc. R. 15 (9/1/82; Revised 12/2/87)	IA	Every motion or other application relating to discovery must include certification by counsel that the parties made a good faith effort to resolve the discovery dispute. This requirement includes a face-to-face meeting between counsel.  Loc. R. 14(E) (9/1/82; Revised 3/27/86, 4/6/92)	IA	Loc. R. 17, Civil Status and Scheduling Conferences; Management (9/1/82; Revised 2/7/83, 5/20/83, 8/11/86, 12/31/91, 6/15/93, 4/20/94)	

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
D. Or.	Firm pretrial and discovery deadlines for all cases are set immediately at the time of filing.	IA	IA	IA	IA Loc. R. 230-2(a)	IA	IA	
E.D. Pa.	IA	IA	IA	IA	No motion or other application will be made unless it includes a certification of counsel that the parties, after reasonable effort, are unable to resolve the dispute.	No	IA	In special management track cases where it appears that cases are pending in several districts and a motion for consolidation has been filed, the court will determine what discovery is pending in the other cases and require the parties to coordinate with such discovery.
M.D. Pa.	IA	Limits on interrogatories are determined in the discovery/case management plan, subject to later modification by stipulation or court order on an appropriate showing.	Limits on depositions are determined in the discovery/case management plan, subject to later modification by stipulation or court order on an appropriate showing.	IA	IA	IA	IA	The court will amend the local rules to require a certificate of good faith at the time of filing of a discovery motion.
	Loc. R. 26.10 (Revised 11/88)	Loc. R. 26.6 (Revised 11/88)	Loc. R. 30.1 (Revised 11/88)	Loc. R. 26.10 (Revised 11/88)	Loc. R. 26.7 (Revised 11/88)			

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
W.D. Pa.	IA	CR	CR	IA	IA	IA	IA	A motion must be filed for any unresolved discovery or case management dispute.
	Loc. R. 16.1.2A (10/93)				Loc. R. 16.1.2F (10/93)			Loc. R. 16.1.2F Loc. R. 7.1
D.P.R.	Discovery deadlines are set forth in the case management order.	The court will set limits on interrogatories in the case management order.	The court will set limits on depositions in the case management order.	IA	IA Loc. R. 311.11	IA	IA	
D.R.I.	Discovery deadlines may be set during a pretrial conference.	IA	IA	This provision is under review by the court as part of its review of proposed changes to local rules.	Yes	IA	IA	
D.S.C.	Loc. R. 7.01 (12/1/94) Loc. R. 7.02 (12/1/94) Loc. R. 7.04 (12/1/94) Loc. R. 7.10 (12/1/94)	PD  Loc. R. 9.00 (12/1/93)	CR Loc. R. 10.01 (12/1/93)	CR Loc. R. 12.11 (12/1/93)	PD  Loc. R. 12.02 (12/1/93) Loc. R. 12.11 (12/1/93)	IA	IA	The court rejects automatic stays of merit discovery pending resolution of jurisdictional disputes; current procedures allow for limitation or stay of discovery upon the motion of either party.
D.S.D.	A discovery schedule is submitted jointly by counsel for inclusion in the scheduling letter.	ĬA	ĬA	No. However, attorney certification is required for discovery motions.	Yes (PD)  Loc. R. 37.1 (1992)	IA	IA	Sanctions will be imposed for abuse of discovery.

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
E.D. Tenn.	IA Loc. R. 16.1	No party will be entitled to more than 30 interrogatories without prior leave of the court.	No party will be entitled to take more than 10 depositions without prior leave of the court, or take a single deposition of more than 8 hours without prior leave of the court or agreement of the parties.	IA	All nondispositive motions will be accompanied by a certificate signed by counsel affirming that, after consultation, they are unable to reach an accord.	IA	IA	
M.D. Tenn.	Discovery deadlines are set in the case management order.	Any limitations on interrogatories will be based on the particular needs of each case.  Loc. R. 9(a)(2) (3/84)	Any limitations on depositions will be based on the particular needs of each case.	IA	IA	IA	Discovery will be staged according to the needs of each stage of the case (e.g., settlement, dispositive motions, trial) if the case manager determines that staging is appropriate.  Loc. R. 11(d)(1)(c)(3)(a)	
	Loc. R. 11(d)(2)(f) (3/94)	Loc. R. 11(d)(1)(c)(3) (3/94)	Loc. R. 11(d)(2)(f) (3/94)	Loc. R. 9(e)(3) (3/84)			(3/94) Loc. R. 11(d)(2)(f) (3/94)	
W.D. Tenn.	IA	IA	IA	CR	PD	IA	IA	The court will implement, to the extent that it is not already required, a requirement that counsel jointly present a discovery management plan at the pretrial conference. The court will encourage

Table 6: Discovery Requirements

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
	Loc. R. 13(b)(1)(C) (Revised 1/93)	Loc. R. 13(c) (Revised 1/93)				Loc. R.13(b)(1)(A)– (C) (Revised 1/93)		voluntary exchange of information and cooperative discovery devices through informal judicial persuasion. The court also will adopt a local rule incorporating guidelines for professional courtesy and conduct.
E.D. Tex.	IA	Limits on interrogatories are set by DCM track: no interrogatories in tracks 1 and 2, 25 interrogatories in tracks 3 and 4, and a number to be determined by the court in tracks 5 and 6. (This is a revision of the original DCM plan, by general order on 10/94.)	Limits on the number of depositions are set by DCM track. Track 3 allows depositions of the parties and depositions on written questions of custodians of business records for third parties. Track 4 has the same limits as track 3 plus 3 other depositions per side. Tracks 5 and 6 will have discovery plans determined by the judicial officer. (This is a revision of the original DCM plan, by general order on 10/94.) In addition, witnesses or parties' depositions will	IA	IA	IA	IA	The court will provide a judicial officer on call during business hours to rule on discovery disputes and to enforce provisions of the plan. Counsel can call the hot line for any case in the district to get an immediate hearing on the record.

District	Discovery Deadlines	Limits on Interrogatories	Limits on Depositions	Parties Sign Deadline Extension Requests	Meet and Confer Before Filing Motions	Judge's Permission to File Motions	Staged or Phased Discovery	Other
			be taken on weekdays, and will not last more than 6 hours (unless the court orders otherwise). The 6-hour limit will be evenly divided among plaintiffs and defendants for nonparty witnesses. Depositions may be taken after 5:00 PM on weekdays, or on holidays, with the approval of the judicial officer or by agreement of counsel. Attorneys are prohibited from instructing the deponent not to answer a question, except to assert a recognized privilege. Other objections will be made at trial.					
N.D. Tex.	Unless the presiding judge otherwise directs, a firm date for completion of discovery will be fixed at an early stage of the litigation. The continuance of a trial will not extend the date	IA	IA	Motions for continuance must be signed by the party as well as by the attorney of record. The granting of a motion for continuance will not extend or revive any deadlines that	IA	IA	IA	The court does not impose any specific limitations on discovery in light of the anticipated changes to the Fed. R. Civ. P. (Following adoption of the new discovery rules, the court

Table 6: Discovery Requirements

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	for completion of discovery unless ordered by the presiding judge. In every case determined by the presiding judge to be complex, an early conference will be held in order to develop a discovery scheduling order.			have already passed in a case unless ordered by the presiding judge.				adopted Special Order 2-12 on 12/21/93. This order provides that the court will not uniformly abrogate, modify, or exercise an option provided by any of the newly revised rules. Each judge will apply them in the manner the judge deems appropriate and will provide parties with appropriate notice. The court will confer with the Advisory Group to obtain its advice and counsel concerning an appropriate permanent policy to be adopted. The court will also study the individual experiences of its judges in applying these rules.)
S.D. Tex.	Discovery cut-off dates are set in the scheduling order entered at the initial pretrial conference.  Loc. R. 8 (5/88; Revised 1/92, 2/94)	Loc. R. 5.D (5/88; Revised 1/92, 2/94)	IA	All requests for extensions of discovery deadlines or postponement of trial must be signed by the requesting party and counsel.	Loc. R. 6.A.4 (5/88)	IA	In complex cases, the court will consider staged discovery as identified in the Manual for Complex Litigation.	

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W.D. Tex.	Except for cases assigned to the expedited docket, the scheduling order in each civil case will require discovery to be completed within 6 months of the filing of defendant's initial pleadings.	Each party that chooses to submit written interrogatories will be limited to 20 questions. Each separate paragraph within a question and each sub-part contained within a question that calls for a response will be counted as a separate question.	Standard agreements for taking depositions should be used. Videotaped and telephone depositions are permitted with timely notice.  Loc. R. CV-30 and Loc. R.	The court rejects this requirement as inappropriate.	Any party filing a written motion relating to discovery must expressly state therein that reasonable and good faith efforts have been made to reach agreement as to all disputes and why no further agreement could be reached.	IA	IA	
	Loc. R. CV-16(d) (Revised 1/94)	Loc. R. CV-33 (Revised 1/94)	Appendix I (Revised 1/94)		Loc. R. CV-37 (Revised 1/94)			
D. Utah	IA	IA	IA	IA	PD	IA	IA	
D. Vt.	Within 30 days from the date of filing answer, counsel for parties will jointly prepare and file a single schedule for the completion of discovery no later than 8 months from the date on which the answer has been filed. The schedule will provide specific dates by which specific discovery items are to be completed. The discovery schedule filed by the parties will	IA	IA	IA	IA	IA	IA	

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	become the scheduling order provided by Fed. R. Civ. P. 16(b) with respect to the time limits for the completion of discovery and for filing and hearing motions.							
D.V.I.	IA	General Order 33 IA	General Order 33 Depositions are limited to 1 hour each for direct and cross-examination per party for nonparty witnesses, 3 hours direct for party and expert witnesses, and an equal amount of time for each party for cross. Except by parties stipulation or order of the court, no more than 1 attorney for each party may question the deponent.	The Advisory Group recommended against this requirement and the court did not adopt it.	IA	IA	IA	Expert witnesses testimony at trial will be limited to the opinions advanced in their written reports. The court encourages the videotaping of expert witness testimony. If a firm trial date is set at least 45 days in advance, but expert witness testimony has not been videotaped and the witness is not available for trial, the parties must proceed with trial (unless good cause is shown). The noticing party will pay an expert's reasonable charges for the deposition, unless the parties or attorneys have agreed otherwise in writing. If the

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	Loc. R. 16.1(b)	Loc. R. 33.1	Loc. R. 26.2(a)		Loc. R. 37.1			deposing party objects, they may apply to the court for a ruling on reasonableness.
E.D. Va.	(7/21/92) PD Loc. R. 12(C) (8/62; Revised 2/89)	(7/21/92) IA Loc. R. 11.1(A.1) (1/80; Revised 2/89)	(7/21/92) IA Loc. R. 11.1(B) (1/80; Revised 2/89)	CR Loc. R. 11.1(K) Loc. R. 12(E)	(7/21/92) PD Loc. R. 11.1(J) (8/62; Revised 1/80, 2/89)	IA	IA	The court's efforts predate the CJRA.
W.D. Va.	As a general rule, the discovery cut-off should be 45 days before the trial date.	IA	IA	IA	IA	IA	IA	Discovery will be governed by the Fed. R. of Civ. P., effective 12/1/93, with the exception that the period for initial disclosures under Fed. R. Civ P. 26 will be 20 days after the opposing party has filed a response rather than 10 days.
E.D. Wash.	IA  Loc. R. 32	IA  Loc. R. 33(b)	IA  Loc. R. 32	IA	IA  Loc. R. 37(b)	IA	IA	The court will consider, on a case-by-case basis, discovery management techniques to make the process more efficient, as long as those techniques do not intrude on the rights of litigants.
W.D. Wash.	The court will continue to limit the time period for discovery in all cases.	The court will issue an order at the start of every case governing the conduct of depositions and discovery.	The court will issue an order at the start of every case governing the conduct of depositions and discovery.	IA	The court will continue the practice of advising counsel at the start of each civil case that all discovery	IA	Yes	The court will continue the practice of resolving discovery disputes through a telephone

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					matters are to be resolved by agreement if possible.	Loc. R. CR 37(g)		conference with the presiding judge.
N.D. W. Va.	IA	The court may alter the limits in the local rules for particular types or classifications of cases.	IA	IA	IA	IA IA	IA	Except for depositions of a party, with leave of the court, or upon agreement of the parties, a party may not seek discovery from any source before making its disclosures. All parties have a duty to supplement or correct disclosure responses or discovery. Every discovery request, response, or objection must be signed by at least 1 attorney of record (or party, if unrepresented), with address, as a Fed. R. Civ. P. 11 certification. Parties may obtain discovery by: depositions on oral examination or written questions, written interrogatories, production of documents or things or permission to enter land or other property

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								under Fed. R. Civ. P. 34 or 45(a)(1)(c) for inspection and other purposes, physical and mental examinations, and requests for admission. Unless otherwise limited by order of the court in accordance with these rules, parties may obtain discovery on any matter not privileged (relevant to the subject matter), whether it relates to claims, defenses, and so on. Frequency, extent, or use of discovery methods may be altered if the court finds it to be unreasonably cumulative or the burden outweighs the benefit. A party may, by deposition, examine any person who has been identified as an expert whose opinion may be used at trial. A party may, through interrogatories or depositions,

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								discover facts known or opinions held by an expert retained or specially employed by another party anticipating litigation. Unless manifest injustice would result, the court will require the party seeking discovery to pay the expert a reasonable fee or a fair portion. Parties must expressly claim and support claims of privilege of trial preparation material. The court will impose sanctions (including reasonable expenses and fees) on the person (or the party) whose certification of request, response, or objection violated the rule. Under limited circumstances (e.g., good cause shown ), the court may make any order that justice requires to protect a party or person from

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	Loc. R. 2.08 Loc. R. 2.12	Loc. R. 2.08	Loc. R. 2.09	Loc. R. 1.04	Loc. R. 2.08		Loc. R. 2.13	annoyance, embarrassment, oppression, or undue burden or expense. If the motion for such an order is denied (in whole or in part), the court may, on just conditions, order any person or party to provide or permit discovery. The court will impose sanctions (including reasonable expenses and fees) on the person (or the party) whose certification of request, response, or objection violated the rule.
S.D. W. Va.	Once issues have been joined, the court will establish a binding discovery schedule under which all discovery will be completed. Counsel will have 21 days from the entry date of the time frame order to move for modifications of the discovery	IA	IA	IA	IA	IA	IA	If counsel makes repeated requests for extensions of discovery, the court may require that the parties consent to such requests in writing.

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	schedule.  Loc. R. 2.01	Loc. R. 3.04			Loc. R. 3.01		Loc. R. 3.01 Loc. R. 3.04 Loc. R. 3.05	
	Loc. R. 3.01	Loc. R. 3.01	Loc. R. 3.01	Loc. R. 3.01	Loc. R. 3.07	Loc. R. 3.07	Loc. R. 3.06	
E.D. Wis.	Loc. R. 7.01(1) Loc. R. 7.07 Loc. R. 7.08 (1/1/92)	Any party may serve upon any other party a maximum of 15 written interrogatories. Mandatory interrogatories and those inquiring about the names and locations of persons with discoverable knowledge are not included in this limit. If more interrogatories are needed, parties should attempt to reach a written stipulation. If this cannot be reached, the requesting party may move to have the court allow additional interrogatories.  Loc. R. 7.03 (Revised 1/1/92)	Loc. R. 7.10 (1/1/92)	IA	Loc. R. 6.02	IA	IA	
W.D. Wis.	Discovery deadlines will be set at the preliminary pretrial conference.	IA	IA IA	IA	IA	IA	IA	In most cases, parties will regulate their own discovery within the bounds of the Fed. R. Civ. P. In appropriate cases, counsel may move

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					Loc. R. 3			pursuant to Fed. R. Civ. P. 26(f) for the development by the court of a discovery plan that will limit and schedule discovery and may include limits on interrogatories and depositions and phased discovery. The court rejected the need for a discovery schedule and plan in all cases.
D. Wyo.	IA	IA	Loc. R. 30 (Revised 11/93)	IA	The court will continue its strict enforcement of a local rule requirement that parties make every reasonable and good faith effort to resolve discovery disputes before seeking assistance from the court. Parties are required to certify in writing the efforts undertaken to resolve the dispute.	IA	A local rule requires counsel who will try the case to attend the final pretrial conference. The court said that this was adequate.	
		Loc. R. 33 (11/92)	Loc. R. 31 (Revised 11/93)		Loc. R. 37 (11/92)		Loc. R. 16(f) (Revised 11/93)	